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September 6, 2019

Via e-mail: 76597-33181279@requests.muckrock.com

Mr. Dan Rubins
MuckRock news
Dept MR 76597
411A Highland Ave.
Somerville, MA 02144-2516

Re: CPRA request

Dear Mr. Rubins:

The District Attorney's office and I are in receipt of your e-mail of August 15, 2019, concerning the response to your CPRA requesting copies of the "Brady list" possessed by the District Attorney's office. Your e-mail has been carefully reviewed and considered. Respectfully, the District Attorney's office continues to decline to provide the requested documents.

The objections and exemptions listed in my letter of August 8, 2019 continue to be asserted. In addition, however, and perhaps most importantly, no statutory or case law requires (or allows) the DA to provide this list. The California Supreme Court recently affirmed the confidential nature of these documents in the case of *Association for Los Angeles Deputy Sheriffs v. Superior Court* (S243855). The Court allowed law enforcement to provide names of potential Brady officers to the prosecution, but did not provide that that list could be made public.

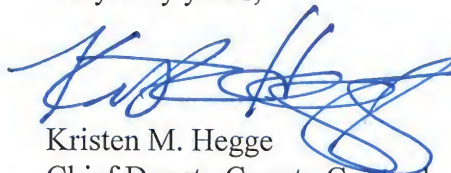
Respectfully, no documents will be provided.

The County does not waive any privileges, protections or objections which might be available in any future litigation, and without waiving any additional privileges, protections or exemptions available under the CPRA.

Mr. Dan Rubins
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Should you have any questions, or should you require any additional information, please do not hesitate to contact the undersigned.

Very truly yours,



Kristen M. Hegge
Chief Deputy County Counsel

c: Scott Fichtner, Assistant District Attorney